IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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BRUCE ALLEN LILLER et.al.

Plaintiff

VS. * CASE NO.: MJG-02-CV-3390 (Consolidated with MJG-02-CV-3391)

ROBERT KAUFFMAN, et al.

Defendants and Third-Party Plaintiffs

v.

ROGER LEE HELBIG

Third-Party Defendant

* * * * * * * * * * *

ANSWER TO DEFENDANT'S FIRST MOTION IN LIMINE

Plaintiffs, Bruce Allen Liller, Mary Liller and Dwight Liller, individually and as legal guardians and next friend of, Michael Paul Liller, Plaintiffs, file this memorandum in defense of the Defendant's First Motion in Limine and state as follows:

Plaintiffs, Bruce Liller, Michael Liller, Mary Liller, and Dwight Liller, by and through their attorney, Arnold F. Phillips, Esq., says as follows:

1. That Plaintiffs deny the allegations made in Defendants Motion for reasons outlined in the attached memoranda.

/S/ Arnold F. Phillips, Esq PO Box 537 McHenry, MD 21541 (301) 387-2800

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 16th day of February, 2004, the foregoing

was electronically mailed to:

Kathleen M. Bustraan, Esquire Jennifer S. Lubinski, Esquire Lord & Whip, P.A., Charles Center South, 10th Floor 36 S. Charles Street Baltimore, Maryland 21201 Attorney for Defendant's and Third-Party Plaintiffs

AND

Donald L. Speidel, Esquire Law Offices of Progressive Casualty Insurance Co. 800 Red Brook Boulevard Suite 120 Owings Mills, MD 21117

AND

Toyja E. Kelley, Esquire Tydings and Rosenberg, LLP 100 East Pratt Street Baltimore, Maryland 21202.